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8 UNITED STATES BANKRUPTCY COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 In re:  
12 PG&E Corporation,  
13 Debtor.

Case No. 19-30088-DM

Chapter 11

**NOTICE OF PERFECTION OF LIENS  
OF GEI CONSULTANTS, INC.  
PURSUANT TO 11 U.S.C. § 546(b)**

14 Tax I.D. No. 94-3234914  
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17 Pursuant to 11 U.S.C. §546(b), GEI Consultants, Inc. ("Claimant") hereby files this  
18 notice of the perfection, maintenance, and continuation of perfection of its liens, claims and  
19 privileges against the interests of PG&E Corporation ("Debtor").

20 As set forth in Claimant's proof of claim on file herein [Claim No. 133], a true and  
21 correct copy of which is attached hereto as **Exhibit 1**, Claimant is owed **\$357,004.47**. As set  
22 forth in the Proof of Claim, Claimant provided labor, work and materials including construction-  
23 related and design/engineering services to the Debtor pre-petition. By virtue of California law,  
24 Claimant has, asserts and is entitled to mechanics' lien and design professional's lien rights.  
25 (Cal. Civ. Code §§ 8014, 8300, 8310, 8400, 8420). Such lien rights are inchoate and relate back  
26 to the original date of the labor, work and materials provided. Claimant's work continued up  
27 through the date of the Debtor's petition date.

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1 But for the petition filing, Claimant would have been paid in full by the Debtor or  
2 Claimant would record mechanics' liens against each of the Debtor's projects for the unpaid  
3 balance of \$357,004.47. However, due to the imposition of the automatic stay, Claimant is  
4 unable to record mechanics' liens to perfect such lien rights.

5 **Therefore, Claimant hereby gives notice of its perfection, maintenance and**  
6 **continued perfection of the interests of Claimant pursuant to 11 U.S.C. § 546(b), in lieu of**  
7 **recordation of mechanics' liens and the filing of a lawsuit to enforce and/or foreclose on**  
8 **the Subject Liens, and/or the filing of any Lis Pendens on the Debtor's properties subject**  
9 **to Claimant's claims. By virtue of this notice and applicable law, Claimant demands**  
10 **adequate protection of its interest in the properties subject to its Claim.**

11 Claimant reserves the right to supplement and/or amend this notice and all rights under  
12 applicable law.

13 It is so respectfully submitted,

14 Dated: April 25, 2019

Worley Law, P.C.

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16 By: /s/ Kirsten A. Worley  
17 Kirsten A. Worley  
18 Attorneys for  
19 Claimant GEI Consultants, Inc.  
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# EXHIBIT 1

\*Exhibit 1 is a Copy of Filed Claim No. 133

**PROOF OF SERVICE**

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is Worley Law, P.C., 1572 Second Ave., San Diego, California 92101.

A true and correct copy of the foregoing document entitled **NOTICE OF PERFECTION OF LIENS OF GEI CONSULTANTS, INC. PURSUANT TO 11 U.S.C. § 546(b)** will be served or was served in the manner stated below:

**I. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (“NEF”):**

Pursuant Local Bankruptcy Rules, the foregoing document will be served by the court via NEF and hyperlink to the document. On 4/25/2019, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

Lynette C. Kelly lynette.c.kelly@usdoj.gov, <a href="mailto:ustpregion17.oa.ecf@usdoj.gov">ustpregion17.oa.ecf@usdoj.gov</a>	<u>Attorneys For Debtor</u> <a href="mailto:pbenvenutti@kellerbenvenutti.com">pbenvenutti@kellerbenvenutti.com</a> <a href="mailto:tkeller@kellerbenvenutti.com">tkeller@kellerbenvenutti.com</a> <a href="mailto:jkim@kellerbenvenutti.com">jkim@kellerbenvenutti.com</a>
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**II. SERVED BY U.S. MAIL:**

On 4/25/2019, I served the following person(s) and/or entity(ies) at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, addressed as follows:

<u>Attorney for Debtor</u> Max Africk Weil, Gotshal & Manges LLP 767 Fifth Avenue New York, NY 10153 (213) 310-0800	<u>Attorney for Debtor</u> Robert P. Goe Goe & Forsythe, LLP 18101 Von Karman Avenue, Suite 510 Irvine, CA 92613 (949) 798-2460
<u>Attorney for Debtor</u> David Herman Cravath, Swaine & Moore LLP 85 Eighth Avenue New York, NY 10019 212-474-1000	<u>United States Trustee</u> Office of the U.S. Trustee Phillip J. Burton Federal Building 450 Golden Gate Ave. 5th Fl., #05-0153 San Francisco, CA 94102 (415)705-3333

PG&E Corporation Claims Processing Center c/o Prime Clerk LLC 850 3rd Avenue, Suite 412 Brooklyn, NY 11232	<u>Official Committee Of Unsecured Creditors</u> Paul S. Aronzon Milbank LLP 2029 Century Park East, 33rd Fl. Los Angeles, CA 90067 (424) 386-4000
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Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

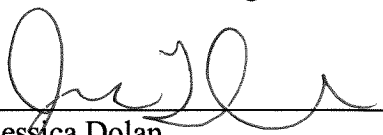
**III. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:**

Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows:


Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 25, 2019, at San Diego, California.

  
Jessica Dolan